



June 18, 2024

**VIA ECF**

The Honorable Vincent L. Briccetti, U.S.D.J.  
U.S. District Court for the Southern District of New York  
300 Quarropas Street, Courtroom: 620  
White Plains, NY 10601-4062

The Honorable Victoria Reznik, U.S.M.J.  
U.S. District Court for the Southern District of New York  
300 Quarropas Street, Courtroom: 420  
White Plains, NY 10601-4062

**Re: Rand v. The Travelers Indemnity Company, Case No. 7:21-cv-10744-VB-VR**

Dear Judges Briccetti & Reznik,

Pursuant to the Court's Order dated April 19, 2024, ECF No. 141, the Parties jointly submit this letter regarding settlement and respectfully request that the Court continue the stay of all deadlines (*see* ECF No. 137).

Since April 19, 2024, both Plaintiff and The Travelers Indemnity Company ("Travelers") have been working together to finalize and document the terms of the settlement reached during mediation on April 16, 2024 in a formal Stipulation of Settlement ("Stipulation"). The Parties continue to work cooperatively and in good faith and anticipate that they should be able to finalize the remaining terms and execute the Stipulation over the coming weeks and be in a position to move for preliminary approval of settlement shortly thereafter. The Parties respectfully submit that they will either file a motion for preliminary approval or file a further update regarding the status of their efforts to finalize the settlement no later than July 18, 2024.

Respectfully submitted,

/s/ Thomas J. McKenna  
Thomas J. McKenna  
*Counsel for Plaintiff Jennifer Rand*

/s/ Donald Houser  
Donald Houser  
*Counsel for Defendant The Travelers Indemnity Company*

cc: All Counsel of Record (*via* ECF)